BLANCHARD, WALKER, O'QUIN & ROBERTS

(A PROFESSIONAL LAW CORPORATION)

JOHN T. COX, JR.

J. EDGERTON PIERSON, JR., P.C. *+

W. MICHAEL ADAMS
WM. TIMOTHY ALIEN III
REGINALD E. CASSIBRY, P.C.
J. DAVID GARRETT
GECIL W. TALLEY
ROBERT W. JOHNSON

TALLEY

ROBERT W. JOHNSON

1400 BANK ONE TOWER, 400 TEXAS STREET
SHREVEPORT, LOUISIANA 71101

TELEPHONE (318) 221-6858 TELECOPIER (318) 227-2967

bwor@bwor.com

MANUNC APPRESS:

Mailing Address: Post Office Drawer 1126 Shreveport, Louisiana 71163-1126 Newton C. Blanchard (1922)
Elias Goldstein (1962)
Henry C. Walker (1963)
Arthur O'Quin (1972)
Wilton H. Williams, Jr. (1975)
Leon O'Quin (1979)
Joseph W. Milner (1969)
Robert Roberts, Jr. (1991)
Clyde W. Thurmon (1992)
Pire Hall, Jr. (1999)

OF COUNSEL
GILBERT L. HETHERWICK
ROBERT ROBERTS III
NEILSON S. JACOBS

Marlin Risinger, Jr. (Retired)

May 15, 2001

* BOARD CERTIFIED TAX LAW SPECIALIST

MICHAEL E. RIDDICK

Leslie Idom Kalmbach Gary H. Love Pamela G. Nathan

Kimberly D. Belanger

STACEY D. WILLIAMS

E. KEITH CARTER

PAUL M. ADKINS A. M. STROUD III

+ BOARD CERTIFIED ESTATE PLANNING AND ADMINISTRATION SPECIALIST

Honorable Philip N. Asprodites Commissioner of Conservation State of Louisiana Post Office Box 94275 Baton Rouge, Louisiana 70804-9275

HEARING APPLICATION
James Formation, Reservoir A
Converse Field
Sabine Parish, Louisiana
Our File No. 370306.0014

Dear Sir:

On behalf of PINNACLE OPERATING COMPANY, INC., application is hereby made for a public hearing to receive evidence concerning the issuance of an order pertaining to the following matters relating to the James Formation, Reservoir A, in the Converse Field, Sabine Parish, Louisiana:

- 1. To create two (2) additional drilling and production units (to be designated as James RA SUP and James RA SUQ) for the James Formation, Reservoir A, in the Converse Field, Sabine Parish, Louisiana, as shown on the plat attached hereto.
- 2. To force pool and integrate all separately owned tracts, mineral leases, and other property interests within each of the proposed units, with each tract sharing in unit production on a surface acreage basis of participation.
- 3. To designate Pinnacle Operating Company, Inc. as the operator of James RA SUP to be created hereby and to designate the Pinnacle Operating Company, Inc.-International Paper 29 H No. 1 Well as the unit well for such unit.
- 4. To provide that the gas allowable provisions of Statewide Order No. 29-F, LAC 43:XIX.2101, et seq., shall not apply to horizontal wells drilled to the James Formation, Reservoir A, in the Converse Field, but that all such wells shall be given

an allowable based on the maximum efficient rate (MER) of the well, being the maximum sustainable daily withdrawal rate from the reservoir which will permit economical development and reservoir depletion without causing waste.

- To amend the well spacing provisions of Order No. 501-B, effective February 1, 1975, to provide for special field spacing rules for any future horizontal well drilled to the James Formation, Reservoir A, in the Converse Field, which would provide (a) that the penetration point and terminus of any lateral of any such horizontal well shall not be located closer than 330 feet to any unit boundary, (b) that the average distance between the productive portion of any lateral and those unit boundaries which run generally parallel to the direction in which the laterals are drilled shall not be less than 1,000 feet, (c) that the distance from any point along the productive portion of any lateral and those unit boundaries which run generally parallel to the direction in which the laterals are drilled shall not be less than 660 feet, and (d) that there be no well spacing limitations between wells other than that accomplished by application of the aforestated provisions.
- 6. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The James Formation, Reservoir A, in the Converse Field, Sabine Parish, Louisiana, is fully defined in Order No. 501-B, effective February 1, 1975.

Petroleum, L.L.C., 400 Texas Street, Suite 800, Shreveport, Louisiana 71101. Any person wishing to inspect such data should call Mr. David Benscoter at (318) 221-3516, during normal business hours, or write Mr. Benscoter at the above address, in order to arrange a time and date for such inspection. Copies of such pertinent data can be obtained at the expense of the requesting party.

A list of the names and addresses of all Interested Owners, Represented Parties and Interested Parties (as defined in the Rules of Procedure) is attached and a copy of this application, with the annexed plat, is being sent to each of such persons. A reasonable effort has been made to determine that the enclosed list includes all of the persons required by the Rules of Procedure. The Applicant will also arrange for mailing, posting and publication of the legal notice of this hearing in accordance with the Rules of Procedure.

By Pre-Application Notice dated May 4, 2001, applicant advised the Commissioner of Conservation, the District Manager and all Interested Owners, Represented Parties and Interested Parties of applicant's intention to apply for the hearing which is the subject of this application. Applicant received no request for a conference, and accordingly, no conference will be held.

Commissioner of Conservation May 15, 2001 Page 3

A check in the amount of \$700.00 made payable to the Commissioner of Conservation is enclosed herewith as the statutory fee for holding the requested hearing.

This application is being filed in duplicate, and a copy hereof is being sent to Mr. James C. Broussard, Shreveport District Manager of the Office of Conservation and to each Interested Owner, Represented Party and Interested Party whose name is shown on the attached list.

Very truly yours,

BLANCHARD, WALKER, O'QUIN & ROBERTS

WTAIII:bp Enclosures Wm. Timothy Allen III

ATTORNEYS FOR PINNACLE OPERATING

COMPANY, INC.

cc: Mr. James C. Broussard, Shreveport District Manager

Office of Conservation (w/enclosures)

cc: Interested Owners, Represented Parties and Interested Parties (w/copy of plat only)

_					₩		
1		JL RA SU D	7100	76	/	JL RA SU UU	
	10 BENSO	JL RA SU T N FIELD	JAMES RC SU C	JAMES RC SU	JAMES RC SU A	JL RA SU 56	
	BENSU	N FIELD		Ford (*)SL	<u> </u>	·	
	. 15	JL RA SU U Morsholi Morrinews 10.235-14 JL RA SU BB	JAMES RC SU D	JAMES RC SU	17	JL RA SU 57 16 JL RA SU 60	
		8704	<i>3</i> ³	Pinnaci Sabine i		Ph. 101	
10 N]	ATTACK THE STATE OF	4624		DeSoto Sabine		
1400	James RA SU D	James RA SU C	James RA SU B 24	Proposition of the second seco	JAMES RC SU G 20	JL RA SU 62	
Ę	/		(9)	/	\ 	JL RA SU 65	
			¥,	~			
	Brighton) MRT Whitney 8781 Bames RA SU G	James RA SU H	James RA SU I 25 **********************************	SECO 30 James RA SU	29	28	
£_	CONVER	SETTLED \	0.909	Wallney 30 (\$1) SL			
	James RA SU N	James RA SU M	36 James RA SU L	James RA SU	Mallard Whilney	33	
() () ()	3 sL 3	2	Block Holder IPCO \$2 8377 1 Shelly Whitney		1111 Whitney 7 300 3 Hilburn Whitney 10:435 Kirk Whitney	4	
	10 5	11	12 Estate Whirney \$\psi^1 12,000	MRT Whitern Hilburn Whitney 7 12 A26	♦ `` 8000 9510	Hilburn Paul \$ R206' 9	
	PROPOSED CONVERSE JA			Pinnacle Operating Company, Inc.			
	15	14 EXISTING CONVERSE JAN — — BENSON FIELD UNITS		IES RA UNITS	Proposed JAMES RA Units Converse Field		
	13 - (
	ACTIVE JAMES LIME PR				Sabine Parish, Louisiana		
N		<u> </u>	NACTIVE JAMES LIME PR	ODUCER		1"=4000'	